

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Federally-Enforceable permit No. F-06-008 (Initial)

AMAK BRAKE, L.L.C

GLASGOW, KENTUCKY

May 10, 2006

MIN WANG

AFS Plant I.D. 21-009-00067

AI# 15685, APE# 20060001

**SOURCE DESCRIPTION:**

Amak Brake LLC consists of two manufacturing departments. These departments are the Friction Department and the Caliper Department. The Friction Department produces asbestos free brake pads and the Caliper Department puts together the brake calipers.

**COMMENTS:**

Amak Brake LLC has applied for an initial conditional major permit, which this facility originally possessed a Title V permit (V-00-032) and it was revised on December 10, 2001. During the period of renewing their Title V permit (V-00-032), the facility wanted to take federal enforceable limits to become non-major source since MEK has been delisted as a HAP. By becoming a non-major source, this facility is exempted from 401 KAR 59:225: New miscellaneous metal parts and products surface coating operations, and 40 CFR 63 Subpart MMMM: National emission standards for hazardous air pollutants for surface coating of miscellaneous metal parts and products. This facility has also removed four wet marking and painting lines ( Powder painting has replaced wet painting) and an open top vapor degreaser with Trichloroethylene.

Amak Brake has proposed to replace 4 grinders [EP04] with 2 new grinders in two phases. One new grinder will replace two old grinders in March 2006; another new grinder will replace the other two old grinders in April 2006. This two-phase grinder replacement will not cause any emission increase. Section H, Alternative Operating Scenarios, includes all alternatives caused by this two-phase grinder replacement.

Amak Brake requests emission limitation to restrict the plantwide VOC emission rates to be less than 90 tons per year. Also to preclude Title V applicability, the emissions of combined hazardous air pollutants shall not exceed 22.5 tons per year, the emissions of an individual hazardous air pollutants shall not exceed 9.0 tons per year, and the plantwide particulate emission rates are limited to less than 90 tons per year. Therefore, 401 KAR 52:030, Federally-enforceable permits for non-major sources, is applicable for the source.

**PUBLIC AND U.S. EPA REVIEW:**

On March 24, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Daily Times* in Glasgow, Kentucky. The public comment period expired 30 days from the date of publication.

***Comment received***

Comments were received from AMAK Brake L.L.C. on April 24, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

1. Volatile organic compound (VOC) emissions shall not exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.
2. Hazardous air pollutants (HAPs) emissions shall not exceed 9 tons per year individually and 22.5 tons per year combined based on a rolling 12 month total for the entire source to preclude a major source Title V review.
3. Particulate matter (PM) emissions shall not exceed 90 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V review.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

# ATTACHMENT A

## Response to Comments

Comments on AMAK Brake L.L.C in Glasgow, KY Draft Federally-Enforceable Air Quality Permit submitted by Eric Swafford, Safety/Environmental engineer in AMAK Brake L.L.C in Glasgow , KY.

### **Federally-Enforceable Permit**

1. AMAK has reviewed the posted conditional major permit F-06-008 and found a discrepancy on the frequency of EPA Reference Method 9 readings on page 20 of the draft permit. AMAK believes the section 4. (h) should state the reading should be conducted annually instead of quarterly.

*Division's response: The frequency of EPA Reference Method 9 readings under Specific Monitoring Requirements on Page 20 has been changed from Quarterly to Annually, so requirement for the frequency of EPA Reference Method 9 readings is consistent through the whole permit. The original quarterly reading requirement for Method 9 was a copy-paste error.*